

May 16, 2005

National Organic Standards Board
C/o Arthur Neal
Room 4008-South Building
1400 and Independence Avenue S W
Washington, DC 20250-0001

Dear Mr. Neal:

I am writing in response to the NOSB "Guidance for Interpretation of section 205.239(a) (2) of the national Organic Program, published for the public comment on March 22.

I am against portions of the language of Sections (A) and (C), and I am in favor of the language in section (B).

The language in Sections (A) and (C) will be extremely detrimental to many of the operations that are currently operating as organic or are trying to comply with the organic standards. I have great concerns with someone, who is not familiar with an operation, setting numerical standards for the feed and care. I don't understand how a cow in Iowa would be expected to have the same dry matter in her diet as a cow on the dry high desert area of Idaho. I find the language of Section (B) to be much more sustainable. Every cow needs to be comfortable. I have milked cows for 32 years and know the importance of protecting my cows. I could continue to certify my operation under the guidance of section B, but I think I would have to remove myself from the program if the language in section A and C were adopted.

I have been selling alfalfa hay that has been organically certified in Idaho and Colorado for several years. I believe if the language of sections A and C were adopted, I would lose this market. The sad part is that we would lose many dairies, at a time when the normal operation requires the daily inputs of steroids and antibiotics.

The operator of an animal feeding operation, whether it be dairy or beef operation, needs to be able to adapt his program to comply with requirements of national or state standards. The language in section B will allow for that. I am very much opposed to the five reporting requirements of section A. They are not workable. These requirements would make it extremely difficult. I don't see how one could even measure results from these records. The farmers are already keeping extensive records and will be overburdened with these additional records, that I feel serve no real useable purpose.

Section (B) has language that would work for the organic grower and allow each individual to structure his program to best meet the animals needs.

Thank You

Robb Peck
Robb Peck
Sagebrush Farms